

13. Whether, at the time BellSouth negotiated and executed its Interconnection Agreement with ACSI, it knew that it could not provision unbundled loops with ACSI in compliance with the negotiated terms and conditions of the Interconnection Agreement.

14. Whether, at the time BellSouth entered into the Interconnection Agreement, it knew that it had not developed or tested its ability to process orders for unbundled loops in the installation time periods established in the Interconnection Agreement.

15. Whether BellSouth explicitly or implicitly represented during the negotiations that it could provide interconnection and unbundled loops and, if so, whether ACSI negotiated the Interconnection Agreement in good faith reliance upon BellSouth's representations of the terms and conditions under which it would provision unbundled loops.

16. Whether an implementation schedule was agreed upon by ACSI and BellSouth, and what the terms of such implementation schedule, if any, are.

17. Whether ACSI's orders for unbundled loops were consistent with an implementation schedule developed pursuant to Section XVIII of the Interconnection Agreement.

18. Whether ACSI had requested any testing of unbundled loop cutovers, and if so, the results and adequacy of such tests.

19. Whether BellSouth had requested any testing of unbundled loop cutovers or the procedures to be used for the ordering of unbundled local loops.

20. Whether ACSI submitted test orders for unbundled loop cutovers to BellSouth, and, if so, on what dates and with which PONs and whether such test orders were successfully completed and when.

21. Whether BellSouth requested joint testing of RCF in connection with provisioning of SPNP for customer line cutovers and whether ACSI agreed to any request, if made by BellSouth.

22. Whether ACSI gave BellSouth advance notice of its intention to order loops.

23. If successful test orders were not placed, whether the Interconnection Agreement obligated BellSouth to provide unbundled loops or cutover BellSouth customers' loops to ACSI prior to testing.

24. If successful test orders were not placed, whether ACSI knew or should have known that a period of testing was essential for the operational provision of unbundled loops and the cutover of customer loops from BellSouth to ACSI.

25. If successful test orders were not placed, whether ACSI knew or should have known that ordering loops prior to the testing and refinement of ordering procedures, and technical provisioning procedures was likely to reveal weaknesses in such procedures and could result in impaired utility of the unbundled loops involved and concomitant disruption to customers relying on such loops.

26. If successful test orders were not placed, whether joint testing between ACSI and BellSouth prior to ACSI's placement of orders for unbundled loops would have minimized the likelihood of disruptions.

27. Whether ACSI ordered the cutover of customer loops from BellSouth to ACSI during business hours, and whether the switches in which SPNP was being implemented were likely to be busy at those times.

28. Whether ACSI acted reasonably and prudently under the circumstances in which it ordered the cutover of customer loops in late November 1996.

29. What the nature and duration were of any outages and disruptions to any ACSI customer whose unbundled loops were cut over in late November 1996 or at any time thereafter.

30. Whether the outages and disruptions to ACSI customers whose unbundled loops were cut over in late November 1996 were due in whole or in part to the actions and practices of ACSI.


31. Whether ACSI's alleged decision to order unbundled loops in November 1996 and to begin provision of service as a CLEC prior to the end of 1996, without any joint testing, was in any way related to the negotiation of preliminary agreements between ACSI and MCI, announced in January 1996, pursuant to which ACSI will become MCI's preferred provider of CLEC service for resale.

32. Whether ACSI's alleged decision to file complaints with both the Georgia Public Service Commission and the FCC, despite the fact that the service disruptions that occurred in late November 1996 allegedly had been resolved and the Parties were engaged in ongoing attempts to resolve unbundled loop cutover issues more generally, was related to high-level management changes at ACSI during December 1996 and January 1997.

33. Whether ACSI's alleged decision to file complaints with both the Georgia Public Service Commission and the FCC, despite the fact that the service disruptions that occurred in late November 1996 allegedly had been resolved and the Parties were engaged in ongoing attempts to resolve unbundled loops cutover issues more generally, was otherwise undertaken for any purpose other than good-faith resolution of the disputes stated in the Complaint.

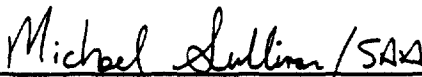
Respectfully submitted,

**AMERICAN COMMUNICATIONS  
SERVICES, INC.**

By:   
Brad E. Mutschelknaus  
Steven A. Augustino  
Marieann Z. Machida  
KELLEY DRYE & WARREN LLP  
1200 Nineteenth Street, N.W.,  
Suite 500  
Washington, D.C. 20036  
202-955-9600

Its Attorneys

**BELLSOUTH TELECOMMUNICATIONS, INC.**

By: /SAA  
L. Andrew Tollin  
Michael Deuel Sullivan  
WILKINSON, BARKER, KNAUER & QUINN  
1735 New York Avenue, N.W.  
Suite 600  
Washington, D.C. 20006-5289  
(202) 783-4141

Its Attorneys

DATED: March 14, 1997

## CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing JOINT STATEMENT OF STIPULATED AND DISPUTED FACTS AND LEGAL ISSUES to be delivered on this 14th day of March, 1997 by hand delivery or by overnight delivery service, on the following persons:

John B. Muleta  
Chief, Enforcement Division  
Common Carrier Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 6008  
Washington, D.C. 20554

Kurt A. Schroeder, Chief  
Formal Complaints & Investigations Br.  
Enforcement Division  
Common Carrier Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 6010  
Washington, D.C. 20554

Gerald Chakerian, Esq.  
Enforcement Division  
Common Carrier Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 6310-C  
Washington, D.C. 20554

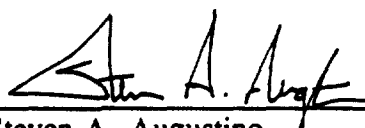
R. Douglas Lackey  
Michael A. Tanner  
BellSouth Telecommunications, Inc.  
675 West Peachtree Street, N.E.  
Suite 4300  
Atlanta, GA 30375

L. Andrew Andrew Tollin  
Michael Deuel Sullivan  
Wilkinson, Barker, Knauer & Quinn  
1735 New York Avenue, N.W., Suite 600  
Washington, D.C. 20006-5289

John B. Adams, Esq.  
Enforcement Division  
Common Carrier Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 6114  
Washington, D.C. 20554

William B. Barfield  
Jim O. Llewellyn  
BellSouth Telecommunications, Inc.  
1155 Peachtree Street, N.E.  
Suite 1800  
Atlanta, GA 30309-2641

David G. Frolio  
BellSouth Telecommunications, Inc.  
1133 21st Street, N.W.  
Washington, D.C. 20036

  
Steven A. Augustino

**EXHIBIT 6**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C. 20554

In the Matter of )

AMERICAN COMMUNICATIONS )  
SERVICES, INC., )  
Complainant, )

File No. E-97-09

v. )

BELLSOUTH TELECOMMUNICATIONS, )  
INC., )  
Defendant. )

RESPONSES AND OBJECTIONS TO ACSI'S FIRST SET OF INTERROGATORIES

BellSouth Telecommunications, Inc., ("BellSouth") hereby submits the following Responses and Objections to *ACSI's First Set of Interrogatories to BellSouth Telecommunications, Inc.*

GENERAL OBJECTIONS

1. BellSouth objects to ACSI's Interrogatories to the extent they would require the disclosure of information subject to the attorney-client privilege or work-product doctrine. Accordingly, BellSouth does not disclose any information subject to the aforementioned protections.

2. BellSouth objects to ACSI Instruction Number 5 which states that BellSouth should "furnish all information and responsive documents in the possession of BellSouth or in the possession of any director, officer, employee, agent, representative, or attorney of BellSouth." To the extent this instruction requires the production of documents, it is an inappropriate use of interrogatories. ACSI had the opportunity to submit ten document production requests to BellSouth and may not use interrogatories to request the additional production of documents. To the extent

this instruction requires the disclosure of information subject to the attorney-client privilege or work-product doctrine, BellSouth incorporates its first objection.

## **RESPONSES**

**ACSI-1: Identify each activity that must be performed by BellSouth and, if applicable, the name and function of the BellSouth system used to perform the action, in order to receive, process, and install an order submitted by ACSI for an unbundled local loop.**

### **Response:**

#### **ORDERING:**

When BellSouth receives a Local Service Request (LSR) order at its Local Carrier Service Center (LCSC) via a facsimile message, the service representative will verify that the proper ordering information is contained on the LSR and will then input the order into the Exchange Access Control and Tracking (EXACT®) system. If the alternative local exchange company (ALEC) submits the order in electronic format through the EXACT system, the BellSouth service representative will review the LSR for accuracy prior to releasing the order to other BellSouth systems.

Once the information has been verified by the BellSouth service representative, the representative will release the LSR to the Service Order Communications System (SOCS). This system creates a service order from the information contained on the LSR. SOCS will then pass the order to Service Order Analysis and Control (SOAC). SOAC then routes the service orders to the appropriate provisioning and installation systems.

## **PROVISIONING:**

The Loop Facility Assignment and Control System (LFACS) is the initial system to receive the service order. LFACS's function is to keep an inventory of available loops in a given cross-section of the BellSouth facility pool. LFACS will attempt to locate cable pairs (from the Main Distribution Frame in the central office to the customer premises) that are compatible with the loop requested on the LSR. If no facilities are available, the order will "fall-out" of the mechanized process. If facilities are available and the loop assignment is made, LFACS will then route the service order back to SOAC. Since the loop in these cases is LFACS-administered, SOAC would next route the order to Computer Systems For Main Frame Operation (COSMOS), which would assign a local loop to a tie pair cross-connect. COSMOS returns the order to SOAC.

SOAC next routes the order to the Network Services Database and to the TIRKS\* System for design and issuance of the Work Order Records and Details (WORD) document.<sup>1</sup> This is done in order to provide the loop make-up or Design Layout Record (DLR) to the ALEC placing the order. The WORD is passed by TIRKS to the Work Force Administration (WFA) and the Network Services Data Base (NSDB). The NSDB matches/merges the SOAC order image with the WORD document from TIRKS to form a line record. The NSDB line record is used by WFA for dispatching and field work activities.

## **INSTALLATION:**

WFA dispatches the order to field personnel, and the work is performed from the design information pulled from WFA. If there is a coordinated disconnect order, which is worked from the COSMOS frame order, a WFA hand-off is issued for manual correlation of the field activities with

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<sup>1</sup> TIRKS is a registered trademark of Bell Communications Research, Inc.

the COSMOS frame order. It becomes critical that the ALEC have provided accurate information on the LSR. The ALEC must have properly identify their equipment in the central office in order for the BellSouth technician to connect the loop to the correct assignment of the ALEC equipment.

**Response Provided by:** Brian Blanchard, Jerry Latham, and Kenneth L. Ainsworth

**ACSI-2** As of July 25, 1996, identify each computer or other electronic system BellSouth had in place which was in any way intended to be used for the receipt, tracking, processing, or installation of unbundled loops ordered by telecommunications carriers such as ACSI, and state whether the system was fully prepared to perform as intended on that date. If you claim that a system was not fully operational, identify its status as of July 25, 1996 and state what activities needed to be performed to make the system fully operational.

**Response:** See Response to ACSI-1. Each system has been identified in that Response. As of July 25, 1996, each of those systems was fully operational and fully prepared to perform as intended, except for correction of the problems identified in the Response to ACSI-12, below, and a minor database change in TIRKS and EXACT to recognize the NC/NCI (Network Channel/Network Channel Interface) codes for unbundled local loops connected to an ALEC's collocated equipment. That change was made between November 14 and November 19, 1996.

**Response Provided by:** Brian Blanchard and Kenneth L. Ainsworth

**ACSI-3:** As of July 25, 1996, identify each manual or other non-electronic system BellSouth had in place which was in any way intended to be used for the receipt, tracking, processing, or installation of unbundled loops ordered by telecommunications carriers such as ACSI, and state whether the system was fully prepared to perform as intended on that date. If you claim that a system was not fully operational, identify its status as of July 25, 1996 and state what activities needed to be performed to make the system fully operational.

**Response:** Any manual activities involved in the receipt, tracking, processing, and installation of unbundled loops are identified in the Response to ACSI-1. As of July 25, 1996, BellSouth was capable of performing these manual activities.

**Response Provided by:** Jerry Latham

**ACSI-4:** As of November 19, 1996, identify each computer or other electronic system BellSouth had in place which was in any way intended to be used for the receipt, tracking, processing, or installation of unbundled loops ordered by telecommunications carriers such as ACSI, and state whether the system was fully prepared to perform as intended on that date. If you claim that a system was not fully operational, identify its status as of November 19, 1996 and state what activities needed to be performed to make the system fully operational.

**Response:** The Response to ACSI-2 is applicable to this interrogatory.

**Response Provided by:** Jerry Latham

**ACSI-5:** As of November 19, 1996, identify each manual or other non-electronic system BellSouth had in place which was in any way intended to be used for the receipt, tracking, processing, or installation of unbundled loops ordered by telecommunications carriers such as ACSI, and state whether the system was fully prepared to perform as intended on that date. If you claim that a system was not fully operational, identify its status as of November 19, 1996 and state what activities needed to be performed to make the system fully operational.

**Response:** The Response to ACSI-3 is applicable to this interrogatory.

**Response Provided by:** Jerry Latham

**ACSI-6** Please provide the basis for your statement in paragraph 53 of the Answer that "BellSouth had the ability to provide unbundled loops at that time." Identify whether BellSouth had the ability to meet the standards set forth in Section IV of the Interconnection Agreement for the installation of unbundled loops, precisely how BellSouth could provide unbundled loops at the time referred to in the statement and identify what "time" is referred to in this statement.

**Response:** When BellSouth negotiated the Interconnection Agreement with ACSI, BellSouth planned to utilize its existing special access service processes as the basis for ordering and provisioning unbundled loops. Minor modifications of the procedures and ordering documents were required to distinguish unbundled loops from special access service circuits so that unbundled loops could be ordered via EXACT, inventoried in TIRKS, and billed. Thus, BellSouth had the ability to meet the standards set forth in Section IV for the installation of unbundled loops at the time it negotiated the Interconnection Agreement.

**Response Provided by:** Jerry Latham

**ACSI-7:** Please provide the basis for your statement in paragraph 53 of the Answer that BellSouth "had not yet fully tested and refined the procedures to be used for ordering and providing them [unbundled loops]." Without limiting the scope of this request, your answer should at a minimum, identify what "procedures" were "to be used for ordering and providing" unbundled loops, what "time" is referred to by this statement and what testing had and had not been performed as of that time.

**Response:** At the time BellSouth negotiated the Interconnection Agreement, BellSouth had not yet had an opportunity to test its procedures for coordinated disconnection of existing service and ordering and provisioning of unbundled loops and associated SPNP in conjunction with ACSI's processes for ordering unbundled loops and associated SPNP or with ACSI's processes for coordinating cutovers of customers from BellSouth to ACSI. Section XVIII of the Interconnection Agreement requires such joint testing as part of the schedule for implementation of the Interconnection Agreement. Such joint testing would, for example, have revealed the need to update the NC/NCI codes, as discussed in the Response to ACSI-2, since ACSI was the first ALEC to request that BellSouth connect unbundled loops to collocated equipment. Joint testing would also have revealed the stenciling errors on ACSI's collocated equipment in Columbus, as discussed in response to ACSI-19 and ACSI-20, as well as the problems discussed in the Response to ACSI-12.

The procedures to be used for ordering unbundled loops are described in the Response to ACSI-1, above. The procedures for ordering unbundled loops with associated SPNP are described in the Facilities-Based Ordering Guidelines provided by BellSouth in its document production on March 17. See BellSouth Documents ##00565 *et seq.*

**Response Provided by:** Martha Jackson, Brian Blanchard

**ACSI-8:** With reference to the statements in paragraph 53 identified in the preceding two requests, identify what, if any, changes in BellSouth's abilities occurred between July 25, 1996 (or, if the statements refer to a different time, the time referred to in the statements) and November 19, 1996, and what, if any, additional "testing" and "refinement" BellSouth conducted or made between July 25, 1996 and November 19, 1996 to the "procedures to be used for ordering and providing" unbundled loops.

**Response:** Although BellSouth did not have the opportunity to conduct joint testing with ACSI between July 25 and November 19, 1996, BellSouth conducted the following internal tests of its systems for ordering and provisioning unbundled loops:

- Service orders were issued in July 1996 through November 1996 to test the flow through of unbundled service orders. The first service order testing was done to test the Reuse Field Identifiers (FIDs) to ensure that the disconnect of single-line voice grade service (Plain Old Telephone Service or POTS) and the add (connection) of the unbundled loop would flow and result in the reuse of the existing working local loop assignments (cable/pair). We found that this process worked if the orders were coordinated. First, the order would be associated with the disconnect and the correct FID. Next, the add issued would be issued, also with the correct FID.
- The service order was logged via the SOAC and TIRKS Systems. The circuit was designed manually, with an Estimated Measured Loss (EML) of 8.0db. The WORD was issued to the downstream systems (WFA, NSDB) to see the results. All systems received the service order and WORD document and CDOC sketches were developed. The test was successful. This first test was issued via cable and pair at the end user with a T1 facility at the ALEC location.
- Additional service orders were issued for the different types of services that were scheduled for the first round of tests (2Wire loop start, 2Wire ground start, 2Wire reverse battery, Basic Rate ISDN, 56 kb/s, and 64 kb/s). The Voice loops were tested with Subscriber Loop Carrier (SLC) and cable and pairs at the end user and TOTIE at the ALEC location.

These tests were necessary to ensure that all Universal Service Ordering Codes (USOCs) were coded properly in the SOAC and TIRKS Systems. The same basic class of service for all types of Unbundled Voice Loop (UVL) and Unbundled Digital Loop (UDL) was used. The USOCs

represent the various circuits and what type of facility could work with these circuits and that the circuit would be assigned correctly from LFACs.

This process worked correctly in the test system. We found that the downstream systems needed to identify the differences between the unbundled services. The same class of service could not be used. New Class of Service USOCs were requested and received for the different types of UVL/UDL. Service orders were issued in the test systems to test the flow in the downstream systems to see if this indeed would be sufficient. This proved to be successful.

Programmable Circuit Design System (PRO-CDS) models were requested, built and downloaded in all nine processors for the various UVL/UDL.

When an ALEC began requesting service in Florida, there were no T1 facilities, nor TOTIE (collocated) facilities. Most of the circuits requested went interoffice, and as a result interoffice facilities were assigned. This was not tested beforehand. We assumed that since it was POTS service the ALEC would be served from the same wire center as the end user. This was not the case.

When an EML is set in TIRKS it is hard coded to meet this objective. This was not a problem if the circuit was on cable and pair. The loss of the circuit (EML) would be whatever loss was in the local loop. But when interoffice facilities are added, TIRKS will try to meet the 8.0db EML set for unbundled services. This caused a problem.

The Circuit Provisioning Group (CPG) was contacted by the Transmission Engineer to make the interoffice facilities and SLC assignment plug-ins transparent to the ALEC. This caused the CPG to re-do all PRO-CDS designs. The problem was not readily identified, and when it was brought to our attention, we began the correction process. To handle this request, new function codes had to be created internally for every plug-in that could be used on these circuits. Included with the new function codes were also new levels. All circuits that had voice levels were affected. The coding has been completed, and all two-wire UVL PRO-CDS models have been updated.

There was one other problem. If the end user was served via SLC, POTS plug-ins should have been in place (as for an existing BellSouth customer). The WORD document indicated Special POTS (SPOTS) plug-ins. This created confusion because Plug-In Control System (PICS) tried to ship the plug-ins. POTS plug-ins should have been used and should have been in place. Function codes did not exist for POTS plug-ins because POTS plug-ins were never used on a designed circuit. (Bellcore usually creates function codes for designed services.) BellSouth had to create function codes for POTS plug-ins to ensure they would no longer be ordered via TIRKS/PICS. PRO-CDS models had to be updated and this too has been resolved.

**Response Provided by:**      Sharron Smith

**ACSI-9:** As of November 19, 1996, did BellSouth have the capability to provide unbundled loops and service provider number portability in accordance with the standards established in Section IV of the Interconnection Agreement? If you contend that BellSouth did not have the capability to provide unbundled loops at that time, identify each and every area in which you contend BellSouth lacked the capability and what was necessary for BellSouth to obtain that capability.

**Response:** As of November 19, 1996, BellSouth had the capability to provide unbundled loops and Service Provider Number Portability (SPNP) in accordance with the standards set forth in the Interconnection Agreement. As stated in the Facilities-Based Ordering Guidelines (See BellSouth Documents ##00566, 00618, and 00627), these orders must be coordinated and must be provisioned in conjunction with each other. Coordination is, of necessity, a responsibility of both parties to the agreement (both the ALEC and BellSouth). Upon notification by the ALEC that an unbundled loop order is to be coordinated with the provision of SPNP, BellSouth will schedule the project work needed to ensure that the conversion of the customer from BellSouth to the ALEC is made in a timely and accurate manner.

**Response Provided by:** Martha Jackson, Jerry Latham

**ACSI-10:** Identify each and every action BellSouth took in the first 30 days after July 25, 1996 to "adopt a schedule for the implementation of this Agreement" as referred to in Section XVIII of the Interconnection Agreement. For each action BellSouth took, your answer should, at a minimum, identify precisely what action was undertaken, the person(s) at BellSouth that took the action, the person(s) (if any) at ACSI that BellSouth contacted, the outcome of the action, and all persons at BellSouth with knowledge of the action taken.

**Response:** During that period of time, BellSouth's practice was to respond to implementation activity initiated by ALECs. When an ALEC requested the adoption of an implementation schedule, BellSouth worked with the ALEC to develop such a schedule. If the ALEC did not request an implementation schedule, BellSouth did not initiate such activity. ACSI contacted numerous BellSouth employees during that period regarding various implementation matters, but never requested the adoption of a comprehensive implementation schedule. BellSouth's employees worked closely with ACSI regarding each of ACSI's inquiries during that period.

In addition to responding to the multitude of inquiries from ACSI regarding the implementation of various elements of the Interconnection Agreement, on August 22, 1996, Gloria Calhoun, Director - Strategic Planning of BellSouth, and Nancy Murrah of ACSI had a telephone conversation that resulted in BellSouth's providing to ACSI, via overnight mail, two copies of the Facilities-Based Ordering Guidelines. Ms. Calhoun also held a conference call on August 23, 1996, with Ms. Murrah to respond to questions concerning that document and to discuss generally the ordering procedures described in that document. The Facilities-Based Ordering Guidelines were updated in October 1996 and a copy was mailed to Paul Kingman of ACSI on October 31.

Also, on August 14, 1996, Jim Linthicum, Jane Raulerson, and Stephanie Cowart of BellSouth met with Michelle Gemke, Brenda Renner, and other ACSI employees to discuss traffic flows, billing and records exchange on traffic between BellSouth and ACSI, and traffic involving third parties, such as other local exchange carriers, wireless service providers, and interexchange carriers.

**Response Provided by:** Gloria Calhoun, Stephanie Cowart, Kathleen Massey, Wade Johnson, Pinky Reichert

**ACSI-11:** Between July 25, 1996 and November 19, 1996, identify what requests, if any, BellSouth made for "any testing of the procedures for ordering unbundled loops" or "any testing of the technical aspects of unbundled loop cutovers" (see paragraph 62 of the Answer). If you contend that BellSouth made such a request, your answer should, at a minimum, identify which person(s) at BellSouth made the request, the person(s) at ACSI to whom the request was communicated, the manner in which the request was made (in person, by letter, etc.), and identify all documents which constitute, refer or relate to the request.

**Response:** BellSouth's investigation has not disclosed any such requests.

**Response Provided by:** Ann Haymons

**ACSI-12:** Please explain in detail what additions, deletions, improvements, changes, or other modifications BellSouth made since November 27, 1996 to its procedures (whether computer, electronic, manual or other non-electronic) for receiving, processing, and installing orders for unbundled loops placed by ACSI. For each addition, deletion, improvement, change or other modification BellSouth made, state when it was made, what was done, why it was done, and how the action affected the receipt, processing or installation of ACSI orders for unbundled loops.

**Response:**

1. In December 1996, BellSouth changed its service order writing procedures for coordinated installation of an unbundled loop and disconnection of existing service to eliminate the RRSO (an indicator to reuse the existing loop) from N-orders (orders to establish SPNP) associated with the unbundled loop. Previously, in an attempt to coordinate the installation of the unbundled loop with the disconnection of the existing service and establishment of SPNP, BellSouth had placed the RRSO on the order to disconnect the existing service, the order to establish the unbundled loop, and the order to establish the SPNP. In December 1996, BellSouth discovered that this process did not have the intended effect. Instead of facilitating coordination of the installation and disconnection, the placement of the RRSO on both orders resulted in the elimination of the Frame Due Time (FDT) on the disconnect order when SOAC combined the two orders. Consequently, the order to disconnect existing service would be worked on the due date (usually early in the day) but would not be held until the FDT, when the unbundled loop was to be installed. Elimination of the RRSO from the associated SPNP order caused SOAC to retain the FDT on the disconnect order and resulted in the automatic release of the disconnect order at the FDT.